

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**  
SALDUTTI LAW GROUP

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Counsel for Santander Bank, N.A.

In Re:

Fastline Cargo, LLC d/b/a FLC,  
Debtor.

Case No.: 24-17484-ABA

Chapter: 11

Hrg Date: Sept. 17, 2024 at 10:00AM

Judge: Hon. Andrew B. Altenburg, Jr.

**NOTICE OF SANTANDER BANK, N.A.'S MOTION FOR RELIEF FROM STAY**  
**PURSUANT TO 11 U.S.C. § 362(d)(1)**

TO: Clerk, United States Bankruptcy Court  
District of New Jersey  
Camden, NJ

ALL PARTIES ON THE ATTACHED SERVICE LIST

**SANTANDER BANK, N.A. HAS FILED A MOTION FOR RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)(1) TO ALLOW IT TO EXERCISE ITS APPLICABLE NON-BANKRUPTCY LAW RIGHTS TO THE PROPERTY DESCRIBED BELOW.**

**YOUR RIGHTS MAY BE AFFECTED.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to vacate the automatic stay as to the property identified in the attached schedules to allow the movant to proceed with its non-bankruptcy rights to the property, including but not limited to repossession and sale, or if you want the court to consider your views on the motion, then on or before September 10, 2024, you or your attorney must do all of the following:

- (a) file written opposition to the motion; and
- (b) attend the hearing scheduled to be held at  
Mitchell H. Cohen U.S. Courthouse  
400 Cooper St., 4<sup>th</sup> Floor  
Camden, NJ 08101  
Hon. Andrew B. Altenburg, Jr.

**Courtroom 4B**

**On September 17, 2024 at 10:00 a.m.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief.

Pursuant to L.B.R. 9013-1(b), Santander's Motion requests a waiver of the 14-day stay imposed by Fed R. Bankr. P. 4001(a)(3).

Respectfully submitted,  
SALDUTTI LAW GROUP  
Counsel for Santander Bank, N.A.

*/s/ Rebecca K. McDowell*  
REBECCA K. MCDOWELL, ESQ.

Dated: August 22, 2024

**DESCRIPTION OF SUBJECT PROPERTY**

Six (6) Hyundai vans, VINs ending in 4014, 4016, 4019, 4024, 4025, and 4029